

~~COPY~~

IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSISSIPPI

THERESA BELTON

PLAINTIFF

VS.

CIVIL ACTION NO. CI 2020-0330-LS

**WAL-MART STORES, INC. and
WAL-MART STORES EAST, LP
WAL-MART STORE #816**

DEFENDANT

**COMPLAINT
(JURY TRIAL DEMANDED)**

COMES NOW, the Plaintiff, THERESA BEDFORD, by and through counsel of the record, and files this, her Complaint against the Defendant, WAL-MART STORES, INC., and WAL-MART STORES EAST, LP, and would show unto this Honorable Court the following, to-wit:

JURISDICTION AND VENUE

1.

This court has jurisdiction of the subject matter and the parties. Venue is proper in Lincoln County, Mississippi. The Plaintiff does not invoke federal jurisdiction.

PARTIES

2.

Theresa Bedford is an adult citizen of yette, Mississippi.

3.

Defendant Wal-Mart Stores, Inc., and Wal-mart Stores East, LP, ("Wal-Mart") is a Bentonville, Arizona Corporation, Licensed to do business in the State of Mississippi, whose agent for service process is CT Corporation System, 645 Lakeland East Drive, Suite 101, Flowood, Mississippi 39232.



EXHIBIT A

COUNT I

On or about the 1st day of May, 2018, Theresa Bedford was legally on the premises as an invitee in the Wal-Mart Store #816 located in Brookhaven, Mississippi.

4.

Bedford was on her way to the restroom when she slipped and fell and her head hit some baskets that was sitting near the restroom door. Bedford's teeth came out and were broken in half. She also fell on her left side injuring her shoulder and leg.

5.

Wal-Mart negligently maintained the premises by not keeping their floors dry and leaving unattended in the pathway of store customers where individuals such as Theresa Bedford could be injured.

6.

There was no sign(s) posted to warn of the dangerous condition of the puddle of water.

7.

Wal-Mart negligently failed to inspect the premises for dangerous conditions when it knew, or in the exercise of reasonable care should have known, that condition existed on the , and that such condition would greatly increase the risk that customers, including Theresa Bedford could be injured on the premises.

8.

Wal-Mart negligently failed to warn Bedford of the aforementioned dangerous condition on the premises when it knew, or in the exercise of reasonable care, should have known, that such condition existed or likely would exist.



9.

Wal-Mart sold produce inside its store and owned a duty to the public, including Matthews, to exercise due care in its storage to ensure that the area in which the products are located was safe.

COUNT II

Negligent Infliction of Emotional Distress

10.

Paragraphs 1 through 10 above are incorporated herein as if set forth again in full.

11.

As a further direct and proximate result of the negligence and carelessness of Wal-Mart, Bedford underwent medical treatment and rehabilitative care.

12.

As a direct and proximate result of Wal-Mart's negligence, Bedford has suffered, and will continue to suffer in the future, great physical pain and mental anguish and has incurred, and will continue to incur, expenses in an attempt to treat the injuries she sustained.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Theresa Bedford requests judgment for damages, including pain and suffering, emotional distress and medical expenses in the total sum of \$74,500.00 against the Defendant, Wal-Mart Stores, Inc. and Wal-Mart Stores East, LP.

And any other relief the Court deems proper.

This the _____ day of _____, 2020.



Respectfully Submitted:

THERESA BEDFORD

BY: _____

JEFFERY HARNESS
POST OFFICE BOX 758
Fayette, Mississippi 39069
Telephone: (601)-446-6769
Fax: (601)- 653 – 9611

